

AO 91 (Rev. 08/09) Criminal Complaint
United States District Court
Southern District of Texas
FILED

OCT 28 2019

UNITED STATES DISTRICT COURT

for the

David J. Bradley, Clerk

Southern District of Texas

United States of America
v.
Fernando PEREZ
(United States Citizen)
DOB: 03/27/1982

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)
)
Case No. M-19-2615-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 27, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 841

Offense Description

Knowingly and intentionally possessed with intent to distribute approximately 66
kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachment "A"

✓ Continued on the attached sheet.

Approved
AUSA L. Garcia


Complainant's signature

Isidro Martinez, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/28/2019 - B-074.1.


Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Juan F. Alanis

Printed name and title

Attachment A

On October 27, 2019, Homeland Security Investigations (HSI) responded to the scene of a traffic stop for a speeding violation conducted by the Palmview Police Department (PPD) in Palmview, Texas. Law enforcement received information that a tractor trailer matching the description and location of the tractor trailer that was traffic stopped was possibly transporting narcotics.

During the traffic stop an officer with PPD obtained consent from the sole occupant of the tractor, Fernando PEREZ, for a canine and physical search of the tractor trailer.

A Hidalgo County Sheriff's Office Deputy arrived with his service canine to conduct the search. The canine alerted to the sleeper cab area of the tractor. A subsequent search of the cab revealed duffle bags, clearly visible from inside the cab, located on the bunk beds of the sleeper area. The duffle bags were located within proximity of the driver's seat, comingled with PEREZ's personal belongings. Inside the duffle bags were 56 bundles wrapped in black tape with a total weight of 66.22 kilograms. The bundles were probed and were found to contain a white powdery substance which field tested positive for the characteristics of cocaine. A currency counting machine was also located on top of bed close to the duffle bags.

PEREZ was placed under arrest and transported to the HSI McAllen field office where he invoked his Miranda rights and refused to make a statement.